

Naval Audit Service



Audit Report



Marine Corps Transition Assistance Management Program — Preseparation Counseling Requirement

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N2009-0046
15 September 2009

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MEMORANDUM FOR THE COMMANDANT OF THE MARINE CORPS (RFR)

**Subj: MARINE CORPS TRANSITION ASSISTANCE MANAGEMENT
PROGRAM — PRESEPARATION COUNSELING REQUIREMENT
(AUDIT REPORT N2009-0046)**

Ref: (a) NAVAUDSVC memo 7510 N2008-NFO000-0024, dated 3 March 2008
(b) SECNAV Instruction 7510.7F, "Department of the Navy Internal Audit"

1. The report provides results of the subject audit announced in reference (a). Section A of this report provides our finding and recommendations, summarized management responses, and our comments on the responses. Section B provides the status of the recommendations. The full text of management responses is included in the Appendix.

2. Actions taken by the Marine Corps meet the intent of Recommendation 3 and the recommendation is closed. Actions planned by the Marine Corps meet the intent of Recommendations 1-2 and 4-7. These recommendations are considered open pending completion of the planned corrective actions, and are subject to monitoring in accordance with reference (b). Management should provide a written status report on the recommendations within 30 days after interim and final target completion dates. Please provide all correspondence to the Assistant Auditor General Manpower and Reserve Affairs Audits, XX, with a copy to the Director, Policy and Oversight, XXXXXXXXXXXXXXXXXXXX Please submit correspondence in electronic format (Microsoft Word or Adobe Acrobat file), and ensure that it is on letterhead and includes a scanned signature.

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3. Any requests for this report under the Freedom of Information Act must be approved by the Auditor General of the Navy as required by reference (b). This audit report is also subject to followup in accordance with reference (b).

Subj: **MARINE CORPS TRANSITION ASSISTANCE MANAGEMENT
PROGRAM — PRESEPARATION COUNSELING REQUIREMENT
(AUDIT REPORT N2009-0046)**

4. We appreciate the cooperation and courtesies extended to our auditors.



XXXXXXXXXXXXXXXXXX

Assistant Auditor General

Manpower and Reserve Affairs Audits

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Section A:

Finding, Recommendations, and Corrective Actions

Finding: Preseparation Counseling Requirement

Reason For Audit

The audit objective was to verify that active duty Service members were receiving mandatory preseparation counseling 90 or more days prior to their separating from the Marine Corps, as required by Public Law.

Preseparation counseling was identified as an area of concern in the Fiscal Year (FY) 2008 Department of the Navy Risk Assessment.

Synopsis

Our analysis found that in FY 2007, 29 percent of active Service members were not receiving mandatory preseparation counseling 90 or more days prior to separating from the Marine Corps as required by Public Law. The Marine Corps' FY 2008 Annual Report to the Office of the Secretary of Defense (OSD) showed a slightly greater percentage of Marines not receiving timely preseparation counseling, indicating that the FY 2007 conditions we found continued through at least the end of FY 2008. Also, in the first 2 quarters of FY 2009, the Marine Corps reported that 41 percent and 26 percent, respectively, of separating Marines did not meet the 90-day requirement. By not providing counseling when required, the Marine Corps did not ensure that the affected Service members received timely information about the transition services and benefits and entitlements available to assist them in adjusting to civilian life. We were not able to determine why Marines did not receive training as required because about 71 percent of the forms (DD Forms 2648 - Preseparation Counseling Checklist) used to record reasons for not attending training were missing from the Official Military Personnel Files (OMPFs) or were filled out incorrectly. Also, Transition Assistance Management Program (TAMP) Office managers had not determined why Marines were not attending preseparation counseling in compliance with the 90-day requirement. To ensure Marines receive mandatory preseparation counseling in a timely manner, the Marine Corps first needs to determine why Marines are not attending Preseparation Counseling, and then take corrective action. Obtaining and analyzing accurate and complete DD Forms 2648 is a necessary step.

Background

Public Law 101-510, 5 November 1990, mandated the provision for transition assistance services and benefits to separating servicemen and women, and created the Transition Assistance Program, which the Marine Corps implemented as TAMP.

Public Law 107-103, 27 December 2001, states that in no event shall preseparation counseling commence later than 90 days before the date of discharge or release. The law allows for preseparation counseling within fewer than 90 days if the Service member is an “unanticipated loss.”¹ Title 10 of United States Code, Chapter 58, October 1994, requires that a notation that preseparation counseling was received be signed by the member and be placed in the member’s service record.

TAMP consists of a Preseparation Interview with the Unit Transition Counselor (UTC), who is designated by Commanding Officers or Officers-in-Charge to perform the Preseparation Interview for transitioning and retiring personnel. During the interview, the UTC explains the transition requirements, and provides the Service member with DD Form 2648 (also referred to as the Checklist (see Exhibit F)). The Checklist identifies information the Service member will receive during counseling and additional workshops, briefings, and classes. A Preseparation Counseling Brief lasting 1 day follows the Preseparation Interview. The briefing includes subject matter experts outlining the benefits and entitlements available to transitioning Service members. Per Marine Corps Order 1700.24B, Preseparation Counseling Brief, Department of Labor Transition Assistance Program employment workshops are mandatory.

In addition, Marine Corps Order P1700.24B, 27 December 2001, states that Commanding Officers and Officers-in-Charge are responsible for ensuring that Service members attend the Transition Assistance Program Employment Workshop; receive their preseparation counseling; and sign the DD Form 2648 and file it in the Marine’s permanent record at Headquarters Marine Corps (HQMC), as mandated by Public Law.

Communication with Management

Throughout the audit, we held briefings with management to keep them informed of the conditions noted. We briefed Permanent Change of Station (PCS) Support Section (MRRM) in January, April, and June 2008, and obtained updated data from them in June 2009; and the Personnel Management Support Branch (MMSB) of Manpower and Reserve Affairs (M&RA) in April, May, and June 2008. They were kept informed of the results of our site visits to the TAMP and Installations Personnel Administration Offices in North Carolina, California, and Virginia; the sampling plan; and the sampling results.

¹ An “unanticipated loss” is one where a Service member leaves the Service due to administrative, personal, medical, or legal reasons. Such instances often occur less than 90 days prior to the Service member’s departure, which means they cannot meet the TAMP requirement.

The discussion draft of this report was sent to the Program Assessment Branch (MRN), M&RA, for distribution to Personnel and Family Readiness Division (MR) on 23 June 2009. We received their comments regarding the discussion draft on 6 July 2009 and incorporated them into this report.

Audit Results

We found that in FY 2007, 29 percent of active duty Service members were not receiving mandatory preseparation counseling 90 or more days prior to separating from the Marine Corps as required by Public Law 101-503 and Marine Corps Order P1700.24B. Similarly, the Marine Corps' FYs 2007 and 2008 TAMP Annual Reports to OSD stated that about 35 percent and 37 percent, respectively,² of active duty Marines did not receive mandatory preseparation counseling 90 or more days prior to separating. Also, in the first 2 quarters of FY 2009, the Marine Corps reported that 41 percent and 26 percent, respectively, of separating Marines did not meet the 90-day requirement. We attempted to analyze the reasons the Marine Corps did not satisfy the 90-day requirement, but we were unable to do so due to missing, incomplete, and inaccurate documents.

Service Members Not Meeting the 90-Day Requirement

To determine if Service members met the 90-day requirement, we chose Camp Pendleton, CA, as a pilot test site. We chose Camp Pendleton because it had a large number of Service members who were receiving preseparation counseling. We selected March 2007 for the pilot review because hard copy data was readily available. We found 398 of 869 Checklists at Camp Pendleton on which separating Marines had checked a reason for not meeting the 90-day requirement. Of those, 266 did not meet the separation requirement, while 132 had incorrectly checked a reason for not meeting the 90-day requirement although they had actually met it. Based on our analysis at Camp Pendleton (see Exhibit D for Checklist reasons and details), we designed a statistical sampling plan for the entire Marine Corps to test if separating Marines met the 90-day requirement.

We selected a statistical sample of 600 Service members from a list of 34,682 Service members who separated³ from the Marine Corps in FY 2007. We reviewed the 600 Service members' OMPFs, which were provided by Personnel Management Support Branch (MMSB). The OMPFs should contain the Checklist and DD Form 214 (Release

² Our methodology for determining the number of Marines not meeting the 90-day requirement was based on a statistical sample and is discussed below and in Exhibit C. The Marine Corps' numbers were compiled by individual TAMP offices and then rolled into a single report for OSD. We did not determine how the individual offices compiled their results.

³ We used the Action Date in the Marine Corps Total Force System (MCTFS).

or Discharge from Active Duty). However, we found 425⁴ (71 percent) of the 600 OMPFs were missing Checklists. Of the remaining 175 OMPFs, we were only able to analyze 158 Checklists because 17 Checklists had missing pages or the OMPFs did not include the DD Form 214, precluding us from verifying Preseparation Counseling attendance and End of Active Service (EAS) dates for these Marines. We excluded 22 Service members who were unanticipated losses (personal, medical, or legal separations) from our calculations.⁵

For the 136 Marines whose Checklists we were able to analyze, we determined that 97 Marines (71 percent) met the 90-day preseparation counseling requirement, but 39 (29 percent) did not. We projected the number of Service members who did not meet the preseparation counseling 90-day requirement and the number of missing Checklists to the universe of 34,682 in FY 2007 using a 90 percent confidence level. Tables 1 and 2 below show our projections of Marines who did not meet the 90-day requirement (Table 1), and Checklists missing from the OMPFs (Table 2).

Table 1: Service Members Not Meeting the 90-Day Requirement

	90% Confidence Level		
	Lower Bound	Point Estimate	Upper Bound
Percentage	23%	29%	35%
Number	7,977	10,058	12,139

As shown above, in FY 2007, we projected 10,058 (29 percent) of separating Service members did not receive preseparation counseling during the time required by Public Law to “assist them in adjusting to civilian life.” As previously noted, the Marine Corps’ FY 2008 Annual Report to OSD shows a slight increase in the percentage of Marines not receiving timely preseparation counseling, indicating that the FY 2007 conditions verified during the audit continued through FY 2008. We also found that in the first 2 quarters of FY 2009, the Marine Corps reported that 41 percent and 26 percent, respectively, of separating Marines did not meet the 90-day requirement.

⁴ Six Marines were still in the Marine Corps and would not have a Checklist. The six Marines were left in our analysis because they were statistically insignificant.

⁵ OSD guidance for reporting the number of Service members states that “unanticipated losses” will not count against installations for the total 90-day requirement.

Table 2: Missing Service Members' Checklists

	90% Confidence Level		
	Lower Bound	Point Estimate	Upper Bound
Percentage	68%	71%	74%
Number	23,484	24,566	25,598

The above projections show that approximately 71 percent of Checklists were missing from OMPFs. The 71 percent is based on our finding that 425 of 600 OMPFs were missing Checklists.

Reasons for Not Meeting the 90-Day Requirement

Because of the large number of missing OMPFs and incorrectly filled out Checklists, we were unable to determine why Marines did not attend preseparation counseling as required at least 90 days prior to separating. Also, we found that the Marine Corps did not have an effective system/process for collecting, tracking, or analyzing data on the Checklists, or detecting the reasons why Marines did not meet the 90-day requirement. Currently, the UTCs are responsible for sending the Checklists to the Marine Corps' Records Management Branch (MMSB-20) as required by Department of Defense Instruction 1332.36,⁶ Marine Corps Order P1700.24B,⁷ and Marine Corps Order P1070.12K. However, there is no reconciliation process between the UTCs and MMSB-20 to ensure the Checklists are received. Also, although the individual TAMP offices collected Checklists and used them as the basis for quarterly and annual TAMP reports, they did not use the Checklists to track or analyze the reasons for not meeting the 90-day requirement. These conditions represent internal control weaknesses. To strengthen controls, oversight authority should be appointed to ensure compliance with Department of Defense Instructions and Marine Corps Orders. The oversight authority should be responsible for establishing a tracking system that will ensure Checklists are sent to MMSB-20, and establishing a database to collect reasons listed on page 3 of the Checklist, "Item 21." Tracking these reasons will assist the Marine Corps in determining why separating Marines do not meet the 90-day requirement, which will allow them to design and take corrective actions.

Even when Checklists were present in OMPFs, we found Marines did not fill out the Checklists correctly. At Camp Pendleton, for example, we found that 132 (33 percent) of 398 Service members met the 90-day requirement, but on the Checklists they wrongly

⁶ ... states that a signed original Checklist shall be placed in the Service record of each member, and retained as a part of the permanent record.

⁷ ... states that Commanding Officers or Officers-in-Charge ensure that the Checklist is filed in the Service members' permanent record at HQMC, as mandated by Public Law, and the UTCs establish and maintain a tracking system to ensure that the Checklist is properly completed, signed, and mailed to records management section (MMSB-20).

selected a reason for not meeting the requirement. Similarly, of 175 Checklists in our Marine Corps-wide sample that could be analyzed, 18 Service members who met the 90-day requirement wrongly selected a reason on the form for not meeting the requirement, and 11 Service members who did not meet the 90-day requirement did not select a reason for not meeting it. In our pilot test of Camp Pendleton (see Exhibit D for details), we found that about 40 (31 percent) out of 130 Marines selected “Mission” as a reason for not meeting the requirement, but were not deployed 90 days prior to their EAS. Within our statistical sample, we found that six Marines listed “Mission” as a reason for not meeting the 90-day requirement, but they were not deployed 90 days prior to their EAS.

Accountability

Although available data was insufficient for us to determine why Marines did not meet the 90-day requirement, lack of accountability may have been a contributing factor. During our eight site visits to TAMP Offices, discussions with six Marine Corps Community Services personnel (TAMP Managers) indicated that Commanding Officers and Officers-in-Charge were not being held accountable for not meeting the required preseparation counseling timeframe. As stated in Marine Corps Order P1700.24B, Commanding Officers or Officers-in-Charge are to ensure that Service members receive their preseparation counseling.

Summary

In order to ensure Marines receive the preseparation counseling required by Public Law, the reasons why Service members do not meet the 90-day requirement need to be identified and analyzed. To accomplish this, the Marine Corps should develop and implement a tracking system and database to collect reasons listed on the Checklist Page 3, Item 21. The UTC should ensure the Checklists are properly completed, and Commanding Officers/Officers-in-Charge should be held accountable for ensuring Marines attend preseparation counseling within the required timeframe.

Recommendations and Corrective Actions

Our recommendations, summarized Marine Corps responses, and our comment on the responses are below. The complete text of the Marine Corps responses is in the Appendix.

We recommend that the Commandant of the Marine Corps:

Recommendation 1. Establish standard operating procedures that require the UTCs to verify that Checklists are accurately and completely filled out.

Marine Corps response to Recommendation 1. Concur. Per Marine Corps Order P1700.24B, the UTC must ensure the DD Form 2648/2648-1 is properly completed. UTC training is conducted by TAMP staff within 30 days of appointment. This training provides information on the roles and responsibilities of the UTC. Standard operating procedures for UTCs, to include proper completion of the DD Form 2648/2648-1, shall be created and included as an attachment to the revised Marine Corps Order. Estimated Marine Corps Order revision is set for January 2010.

Recommendation 2. Establish a tracking system and database to collect the stated reasons (as shown on Checklist Item 21) for separating Marines not meeting the 90-day requirement.

Marine Corps response to Recommendation 2. Concur. The development of a Case Management System (CMS) to track all Marine Corps TAMP activity, including reasons shown in Checklist Item 21, is currently an action item for FY 2010. We are scheduled to begin drafting business requirements for the CMS in May 2010. CMS roll-out, however, may not occur in the same FY. The CMS will be used by all Marine Corps TAMP personnel, including the UTC. Estimated CMS roll out date is May 2011. An interim status report will be provided in May 2010.

Recommendation 3. Determine from UTCs, TAMP Managers, separating Marines, and others if there are reasons beyond those identified in the Checklist responses for not meeting the 90-day requirement.

Marine Corps response to Recommendation 3. Concur. A TAMP-Family Member Employment Assistance Program Survey was conducted between November 2008 and June 2009 to determine program satisfaction and identify any unmet needs for transitioning Service members and families of military members seeking employment and related services. A total of 1,268 Service members completed the survey. Separating Marines indicated that the top two reasons for not attending the required component of TAMP timely included:

- Mission requirements
 - Deployment cycles
 - Fleet Assistance Programs
 - Command did not allow
 - Work requirements
 - Other
- Not aware that he/she could attend earlier

An additional reason reported but not currently listed on the DD Form 2548 is “workshop was full.” We have not collected data from UTCs, TAMP managers, or commanders to determine other reasons. However, the above survey findings are consistent with surveys conducted locally and with feedback received during the recent TAMP-Family Member Employment Assistance Program Functionality Assessment from TAMP managers.

Recommendation 4. Using the data obtained from Recommendations 2 and 3, develop corrective actions that will ensure Marines required to receive preseparation counseling at least 90 days before their separation do so.

Marine Corps response to Recommendation 4. Concur. Future plans for TAMP include program awareness through marketing as well as the ability to complete the mandated elements of TAMP online. Offering completion of mandated elements online may reduce the number of those attending outside the standard (no later than 90 days prior to separation). A marketing campaign via the Web, posters, marquees, etc., will be appropriate after the revised Marine Corps Order has been published and the online tool has been developed. It is estimated that the revision of the Marine Corps Order will be completed by January 2010 and that the online project will be completed by April 2010. It is further estimated that a marketing campaign will begin in June 2010.

Recommendation 5. Direct Commanding Officers and Officers-in-Charge to implement the corrective action(s) developed in response to Recommendation 4.

Marine Corps response to Recommendation 5. Concur. Future enhancements to TAMP will be communicated to the appropriate levels of leadership within the Marine Corps. The related mission will be outlined for all subordinate elements via a revised Marine Corps Order. The installation commanders will be required to incorporate, as a mission requirement, the mandated transition timeliness into unit separation procedures and local policy documents. The completion of this recommendation is driven by the revision of the Marine Corps Order, which is set for January 2010.

Recommendation 6. Establish a process to ensure the DD Forms 2648, Preseparation Counseling Checklists, are sent to and received by MMSB-20 for inclusion in the OMPFs.

Marine Corps response to Recommendation 6. Concur. Per Marine Corps Order 1700.24B, the UTC is to ensure the DD Form 2648/2648-1 is mailed to MMSB-20. A cross-check does not exist to ensure that the UTC has mailed the forms. MMSB-20 is to ensure that the form is scanned into the Marine’s official OMPF. Cross-checks do not exist to ensure that the same number of forms mailed

by the UTC is received by MMSB-20, or to ensure that the same amount of forms received by MMSB-20 are then scanned. The CMS referenced in response to Recommendation 2 will feature the capability to electronically transfer the DD Form 2648/2648-1 into the OMPF. Failure to send the DD Form 2648/2648-1 to MMSB will become evident by reviewing the number of Service members completing the requirements against the number of forms electronically transmitted to MMSB. Any failed attempts to transfer the DD Form 2648/2648-1 to the OMPF will be included in rejection reports automatically generated after each feed. Rejection reports will be used to correct failed transmission. Estimated completion date is driven by the CMS roll out in May 2011. An interim status report will be provided in May 2010.

Recommendation 7. Establish supervisory and oversight procedures that ensure Recommendations 1 through 6 are implemented as intended on a continual basis. Oversight procedures should be such that they ensure the Commandant of the Marine Corps is formally notified whenever the Marine Corps does not comply with the 90-day preseparation counseling requirement of Public Law 107-103.

Marine Corps response to Recommendation 7. Concur. When the capability to provide unit-specific participation data is available, reports will be generated for review and corrective action by commanders. Further, deficiencies will continue to be identified through the Marine Corps Inspector General inspection process and reported accordingly. This effort and the estimated date are driven by the CMS roll out in May 2011. An interim status report will be provided in May 2010. Marine Corps Inspector General inspections occur on a schedule owned by that office. MRRM does not control the schedule.

Naval Audit Service comment on Marine Corps responses to Recommendations 1 through 7. Actions planned in response to Recommendations 1-2 and 4-7 meet the intent of the recommendations, which are considered open. Because completion of all planned corrective actions for Recommendation 4 is more than 6 months in the future, we are establishing an interim target completion date of 31 January 2010, and ask the Marine Corps to provide us a status report at that time. For Recommendation 3, we determined that feedback received during the recent TAMP-Family Member Employment Assistance Program Functionality Assessment from TAMP managers included UTCs, TAMP managers, or commanders. This meets the intent of the recommendation. We consider Recommendation 3 to be closed for reporting purposes.

Section B:

Status of Recommendations

RECOMMENDATIONS							
Finding ⁸	Rec. No.	Page No.	Subject	Status ⁹	Action Command	Target Completion Date	Interim Target Date ¹⁰
1	1	6	Establish standard operating procedures that require the UTCs to verify that Checklists are accurately and completely filled out.	O	Commandant of the Marine Corps (CMC)	1/24/10	
1	2	7	Establish a tracking system and database to collect the stated reasons (as shown on Checklist Item 21) for separating Marines not meeting the 90-day requirement.	O	CMC	5/31/11	5/14/10
1	3	7	Determine from UTCs, TAMP Managers, separating Marines, and others if there are reasons beyond those identified in the Checklist responses for not meeting the 90-day requirement.	C	CMC	8/24/09	
1	4	8	Using the data obtained from Recommendations 2 and 3, develop corrective actions that will ensure Marines required to receive preseparation counseling at least 90 days before their separation do so.	O	CMC	6/30/10	1/31/10
1	5	8	Direct Commanding Officers and Officers-in-Charge to implement the corrective action(s) developed in response to Recommendation 4.	O	CMC	1/31/10	
1	6	8	Establish a process to ensure the DD Forms 2648, Preseparation Counseling Checklists, are sent to and received by MMSB-20 for inclusion in the OMPFs.	O	CMC	5/31/11	5/14/10
1	7	9	Establish supervisory and oversight procedures that ensure Recommendations 1 through 6 are implemented as intended on a continual basis. Oversight procedures should be such that they ensure the Commandant of the Marine Corps is formally notified whenever the Marine Corps does not comply with the 90-day preseparation counseling requirement of Public Law 107-103.	O	CMC	5/31/11	5/14/10

⁸ / + = Indicates repeat finding

⁹ / O = Recommendation is open with agreed-to corrective actions; C = Recommendation is closed with all action completed; U = Recommendation is undecided with resolution efforts in progress

¹⁰ If applicable

Exhibit A:

Background

Department of Defense Directive 1332.35, “Transition Assistance for Military Personnel,” established policy and assigned responsibilities for transition assistance programs for active duty military personnel and their families on 9 December 1993. The current Marine Corps Order (MCO) P1700.24B, “Marine Corps Personal Service Manual,” 27 December 2001, requires that the Transition Assistance Management Program (TAMP) provide the necessary tools and information to enable all separating Service members to make an effective transition from military to civilian life. The Manual states that mandatory preseparation counseling be provided to all separating Service members 180 days prior to End of Active Service (EAS), but no later than 90 days prior to their EAS.

The Marine Corps TAMP program consists of five components. The first component is the Preseparation Interview with the Unit Transition Counselor (UTC) or the Command Career Planner or Counselor. The interview consists of an explanation of the transition requirements for separating and retiring Service members.

The other four components of TAMP are the Preseparation Counseling Briefing, Transition Assistance Program (TAP) Employment Workshop, Veterans Affairs Benefits Briefing, and the Disabled Transition Assistance Program (DTAP). The Preseparation Counseling Briefing and the TAP Employment Workshop are mandatory by the Marine Corps and can be up to 5 days in length. TAMP was implemented at 18 Marine Corps bases in the United States, Hawaii, and Japan with a dedicated, professional staff.

Each year, the Services are required to send a TAMP Annual Report to the Office of the Secretary of Defense. The reports provided the number of Service members who receive preseparation counseling 90 or more days prior to separation, and the number of Service members who do not meet the 90-day requirement. The Marine Corps’ annual TAMP reports for Fiscal Years 2007 and 2008 showed about 35 percent and 37 percent, respectively, of separating Marines did not meet the 90-day requirement. Also, in the first 2 quarters of Fiscal Year 2009, the Marine Corps reported that 41 percent and 26 percent, respectively, of separating Marines did not meet the 90-day requirement.

Exhibit B:

Pertinent Guidance

Public Law 101-510, 5 November 1990, mandated provisions for transition assistance services and benefits to separating servicemen and women, and created the Transition Assistance Program, which the Marine Corps implemented as the Transition Assistance Management Program (TAMP). It directs the Secretary of Defense, in consultation with the Secretaries of Labor and Veterans Affairs, and the heads of other appropriate Federal departments and agencies, to conduct a program to furnish employment, education, and other information and services to members of the Armed Forces. The Law requires such services to assist such members in assimilating to civilian life and outlines services and activities to be provided under such program.

Public Law 107-103, 27 December 2001, states that in no event shall Preseparation Counseling commence later than 90 days before the date of discharge or release. The Law states that in the case of an anticipated retirement, preseparation counseling shall commence as soon as possible during the 24-month period preceding the anticipated date. In the case of a separation other than a retirement, preseparation counseling shall commence as soon as possible during the 12-month period preceding the anticipated date. In the event that a retirement or other separation is unanticipated until there are 90 or fewer days before the anticipated retirement or separation date, preseparation counseling shall begin as soon as possible within the remaining period of service.

Marine Corps Order (MCO) P1700.24B, “Marine Corps Personal Service Manual,” 27 December 2001:

- Chapter 2, Paragraph 2006.4 states that the Commanding Officers and Officers-in-Charge ensure that Service members attend the Transition Assistance Program Seminar, receive their preseparation counseling, sign the counseling form (DD Form 2648), and file it in the Marine’s permanent record at Marine Corps Headquarters, as mandated by Public Law.
- Paragraph 2006.6 states that the Commanding Officers and Officers-in-Charge designate a Unit Transition Counselor (UTC) as an additional duty to perform the preseparation counseling for transitioning and retiring personnel, and other duties described in accordance with paragraphs 4103.2 and 4103.3.
- Chapter 4, Paragraph 4103.2 states to provide mandatory preseparation counseling to all separating Service members and their families 180 days prior to End of Active Service (EAS), but no later than 90 days prior to their EAS. This information shall include, but will not be limited to, the topics identified on DD Form 2648, Preseparation Counseling Checklist.

- Paragraph 4103.3 states that the UTC shall establish and maintain a tracking system to ensure that the Preseparation Counseling Checklist is properly completed, signed, and mailed to the Records Management Branch (MMSB-20). MMSB-20 shall ensure that the Checklist is scanned into the Marine's Official Military Personnel File (OMPF). The UTC shall keep signed and dated copies of the checklist on file for three years.

MCO P1070.12K, "Marine Corps Individual Records Administration Manual," (IRAM), 14 July 2000, Chapter 1, Paragraph 7 states that Commanders are requested to ensure documents are properly prepared, only authorized documents are forwarded to Commandant of the Marine Corps (MMSB-20), and documents are submitted under a cover letter which includes the Marine's identification information. The IRAM also states that "DD Form 2648, Preseparation Counseling Checklist: Retire to OMPF." The guidance is for both officers and enlisted Service members. DD Form 2648 is to be mailed to MMSB-20.

Exhibit C:

Scope and Methodology

We conducted the audit during the period of 15 October 2007 through 29 July 2009. Our audit work focused on former Service members who did not receive preseparation counseling 90 or more days prior to their separating from the Marine Corps in Fiscal Year (FY) 2007. Exhibit E shows the activities we visited or contacted.

We analyzed applicable policies and procedures to gain an understanding of the Transition Assistance Management Program (TAMP). We conducted interviews with personnel at the Marine Corps' Manpower and Reserve Affairs (M&RA) Permanent Change of Station (PCS) Support Section (MRRM), Marine and Family Services Branch (MRR), and Personal Management Support Branch (MMSB) to obtain information on how preseparation counseling is conducted among the commands. We also interviewed the Transition Assistance Program (TAP) Director, Personnel and Readiness Office, Office of the Secretary of Defense (OSD), to obtain information on TAP management.

We judgmentally selected and visited TAMP Offices at 8 of the 18 Marine Corps bases where the program is offered. Our selection was based on the fact that in FY 2007, 75 percent of the Service members who transitioned out of the Marine Corps received preseparation counseling at Marine Corps bases in North Carolina, California, and Virginia.¹¹ We interviewed Officers-in-Charge or their personnel at Installation Personnel Administration Centers or Consolidated Personnel Administration Centers at the eight bases.

During the site visit to Marine Corps Community Services, Camp Pendleton, CA, we obtained and reviewed DD Forms 2648 (the Checklists) to determine if Service members were receiving preseparation counseling 90 or more days prior to separating from the Marine Corps, and if not, the reasons why not. We chose Camp Pendleton because it had a large number of Service members who were receiving preseparation counseling. We selected March 2007 for the pilot review because hard copy data was readily available. We compared the dates Service members received the preseparation counseling on the Checklists, to Service members' End of Active Service (EAS) dates from the Marine Corps Total Force System (MCTFS). We analyzed Item 21 on the Checklist, which provides the reasons for not meeting the 90-day requirement. Such reasons include Mission Requirement, Personal Reasons, Medical Separation, Legal Separation, Change in Career Decision, and Other. We examined 869 Checklists at Camp Pendleton to help us formulate our statistical sampling plan.

¹¹ The eight bases visited were Camp Lejeune, Cherry Point, and New River, NC; Camp Pendleton, Miramar, and Recruit Depot San Diego, CA; and Henderson Hall and Quantico, VA.

Based on the pilot test at Camp Pendleton, we designed a statistical sampling plan to determine the reasons why Service members did not meet the 90-day requirement. We requested Manpower Information Technology (MIT) Support Team, M&RA personnel, to provide a listing of Service members who separated or retired in FY 2007. The information was pulled by Action Date from MCTFS. The Action Date is the date Service members are administratively removed from MCTFS. On 12 March 2008, MIT M&RA personnel provided a universe of 34,682 Service members who had FY 2007 Action Dates. We selected a random sample of 600 Service members from this universe.

We requested Official Military Personnel Files (OMPF) for the 600 sampled Service members from MMSB. We obtained Checklists and DD Forms 214, "Release or Discharge From Active Duty," from the OMPFs. The DD Forms 214 was used to verify the EAS dates.¹² We compared dates on Checklists and DD Forms 214 to determine whether active Service members were receiving preseparation counseling 90 or more days prior to their separating from the Marine Corps. We also analyzed the date they received the preseparation counseling with EAS dates and last deployment dates obtained from MCTFS to determine whether Service members who selected mission as the reason for not meeting the 90-day requirement were actually deployed.

We conducted this audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We relied on computer-generated data from the MCTFS; however, we did not evaluate the sufficiency of the system's general and application controls. We did not test the reliability of the data because such as test would have constituted a significant audit effort that was outside the scope of our audit work.

There were no previous audit reports regarding the Marine Corps TAMP on which to follow up.

Federal Managers' Financial Integrity Act

The Federal Managers' Financial Integrity Act (FMFIA) of 1982, as codified in Title 31, United States Code, requires each Federal agency head to annually certify the effectiveness of the agency's internal and accounting system controls. In our opinion, the conditions noted in this report are significant and may warrant reporting in the Auditor General's annual FMFIA memorandum to the Secretary of the Navy identifying Department of the Navy-wide internal control weaknesses.

¹² We did not test the data reliability in MCTFS; however, we verified that EAS dates in MCTFS matched the EAS dates in the DD Forms 214.

Exhibit D:

Reasons for Service Members Not Meeting the 90-day Requirement per DD Form 2648 Responses

Camp Pendleton, CA

Below is the distribution of reasons for not meeting the 90-day requirement:

Reasons Not Meeting Requirement

Mission Requirement	130
Personal Reasons	24
Medical Separation	12
Legal Separation	23
Change in Career Decision	21
Other	62
Total	272

*11 Service members selected more than one reason; therefore, figures do not total to the 266 individual responses on DD Form 2648, as discussed in the audit report and Exhibit C.

We compared the date Service members received preseparation counseling with End of Active Service (EAS) dates and last deployment dates to determine whether the 130 Service members who selected mission as the reason for not meeting the 90-day requirement were deployed. The below table shows our results:

Mission Selected

Deployed 90 Days Prior to EAS	73	56%
Not Deployed 90 Days Prior to EAS	40	31%
MCTFS Records Unavailable (Undeterminable)	17	13%
Total	130	100%

Sample of 600 Marines

Thirty-nine Marines out of our sample of 600 did not meet the 90-day requirement. The reasons they did not meet the requirement (according to the explanation given in the Checklists) are shown below:

39 Who Did Not Meet Requirement

Reason	Number of Marines	
Did not Select Reason	11	
Mission	11	
Deployed 90 Days Prior to EAS		5
Not Deployed 90 Days Prior to EAS		6
Other	9	
Change in Career Decision	5	
Reason Unknown*	3	
Total	39	

*Page 3 of the Checklist, which contains the reasons for not meeting the 90-day requirement, was missing from the Marine's OMPF.

For the 39 Marines who did not meet the 90-day requirement, the chart below shows the number of days between taking TAMP and their EAS date:

Days Prior To EAS	Number of Marines
89-61	14
60-31	14
30-0	10
<0	1
Total	39

Exhibit E:**Activities Visited and/or Contacted**

Office of Secretary of Defense Personnel and Readiness Branch	Washington, DC
Marine Corps Air Station *Marine and Family Services Department *Installation Personnel Administration Center	Cherry Point, NC
Marine Corps Air Station *Marine Corps Community Services *Installation Personnel Administration Center	Miramar, CA
Marine Corps Air Station *Marine Corps Community Services *Installation Personnel Administration Center	New River, NC
Marine Corps Base *Marine Corps Community Services *Installation Personnel Administration Center	Camp Lejeune, NC
Marine Corps Base *Marine Corps Community Services *Consolidated Personnel Administration Center	Camp Pendleton, CA
Marine Corps Base *Marine and Family Services Branch *Personnel Management Support Branch *Marine Corps Community Services *Manpower Information Technology Support Branch *Installation Personnel Administration Center	Quantico, VA
Marine Corps Headquarters (HQMC), Henderson Hall *Marine and Family Services *Consolidated Personnel Administration Center	Arlington, VA
Marine Corps Recruiting Depot *Marine Corps Community Services *Consolidated Personnel Administration Center	San Diego, CA

Marine Corps Mobilization Command	Kansas City, MO
Air Force Airman, Family, and Community Operations Branch Directorate of Personnel Services	Universal City, TX
Army Transition Policy Specialist for Army Career and Alumni Program	Fort Belvoir, VA
Navy Fleet and Family Support Programs for Military and Family Readiness	Washington, DC

* Denotes activity visited

Exhibit F:

DD Form 2648 "Preseparation Counseling Checklist"

PRESEPARATION COUNSELING CHECKLIST FOR ACTIVE COMPONENT SERVICE MEMBERS (Please read Privacy Act Statement below before completing this form.)											
SECTION I - PRIVACY ACT STATEMENT AUTHORITY: 10 USC 1142, E.O. 9397. PRINCIPAL PURPOSE(S): To record preseparation services and benefits requested by and provided to Service members; to identify preseparation counseling areas of interest as a basis for development of an Individual Transition Plan (ITP). The signed preseparation counseling checklist will be maintained in the Service member's official personnel file. Title 10, USC 1142, requires that not later than 90 days before the date of separation, preseparation counseling for Service members be made available. ROUTINE USE(S): None. DISCLOSURE: Voluntary; however, it will not be possible to initiate preseparation services or develop an Individual Transition Plan (ITP) for a Service member if the information is not provided.											
SECTION II - PERSONAL INFORMATION (To be filled out by all applicants)											
1. NAME (Last, First, Middle Initial)				2. SSN		3. GRADE					
4. SERVICE (X one) <input type="checkbox"/> ARMY <input type="checkbox"/> MARINE CORPS <input type="checkbox"/> NAVY		5. DUTY STATION <input type="checkbox"/> AIR FORCE <input type="checkbox"/> COAST GUARD		6. ANTICIPATED DATE OF SEPARATION (YYYYMMDD) I am (X one) <input type="checkbox"/> Retiring <input type="checkbox"/> Separating Voluntarily <input type="checkbox"/> Separating Involuntarily							
7. DATE CHECKLIST PREPARED (YYYYMMDD)		7.a. Place an X in this box ONLY if you have less than 90 days remaining on active duty before separation or retirement. Please read the following instructions: If voluntarily separating or retiring and you have less than 90 days remaining on active duty before your separation or retirement, why was your preseparation counseling not conducted earlier? Please go to Section V - REMARKS and check the response that best describes the reason why preseparation counseling was not conducted earlier.									
SECTION III. ALL TRANSITIONING SERVICE MEMBERS MUST READ INSTRUCTIONS, SIGN AND DATE. a. Items checked "YES" are mandatory for Service member to receive further information or counseling, or attend additional workshops, briefings, classes, etc. Service members that check "YES" in Item 11.a. will be released by Commanders to attend the appropriate workshop, briefing, etc. in its entirety. b. Shaded Areas: Areas that are shaded mean (1) the information is not applicable or (2) the information is referring to a Web site address and the URL requires no explanation. For example: 11.b. is shaded under SPOUSE because DD Form 2586 does not apply to spouses. Items 11.f.(1) and (2) are shaded because they refer to Web site addresses and they require no explanation. c. POST GOVERNMENT (MILITARY) SERVICE EMPLOYMENT RESTRICTION COUNSELING (Item 19): Service members cannot decline this counseling. It is required prior to separation. Therefore, no blocks exist to allow Service members the option of checking "YES", "NO", or "NA". Transition/Command Career Counselors shall refer separating and retiring Service members to an installation legal office (Staff Judge Advocate or Counsel's Office) to ensure they receive a post government (military) employment restrictions briefing or counseling from an ethics official. d. I was offered preseparation counseling on the above date (Item 7) on my transition benefits and services as appropriate. I understand that this preseparation counseling is provided to assist my transition process as required by Title 10, USC, Chapter 58, Section 1142. e. I have checked those items where I desire further information or counseling. I have also been advised where to obtain assistance in developing an Individual Transition Plan (ITP). f. <input type="checkbox"/> accept <input type="checkbox"/> decline (X appropriate block) preseparation counseling. (If you check the "decline" box, you are declining preseparation counseling only on those items on this checklist where you have the option of declining.) Sign and date the checklist.											
8a. SERVICE MEMBER SIGNATURE				b. DATE (YYYYMMDD)		9a. TRANSITION COUNSELOR SIGNATURE					
						b. DATE (YYYYMMDD)					
SECTION IV. Please indicate (by checking YES or NO) whether you (or your spouse if applicable) desire counseling for the following services and benefits. All benefits and services checked YES should be used in developing your ITP. The following services and benefits are available to all Service members, unless otherwise specified:											
				SERVICE MEMBER			SPOUSE			REFERRED TO	
				YES NO N/A			YES NO N/A				
10. EFFECTS OF A CAREER CHANGE											
11. EMPLOYMENT ASSISTANCE											
a. Dept. of Labor sponsored Transition Assistance Workshops and Service sponsored Transition Seminars/Workshops											
b. Use of DD Form 2586 (Verification of Military Experience and Training)											
(1) Do you want a copy of your Verification of Military Experience and Training (VMET) Document? If yes, go to http://www.dmdc.osd.mil/vmet to print your VMET document and cover letter.											
c. DoD Job Search Web site http://www.dod.jobsearch.org											
d. Transition Bulletin Board (TBB) and Public and Community Service Opportunities http://www.dmdc.osd.mil/ot/											
e. Teacher and Teacher's Aide Opportunities/Troops to Teachers http://www.proudtoserveagain.com											
f. Federal Employment Opportunities											
(1) http://www.usajobs.com											
(2) http://www.go-defense.com											
g. Hiring Preference in Non-Appropriated Fund (NAF) jobs (Eligible Involuntary Separates)											

DD FORM 2648, JUN 2005

PREVIOUS EDITION IS OBSOLETE.

Page 1 of 3 Pages

PRESEPARATION COUNSELING CHECKLIST FOR ACTIVE COMPONENT SERVICE MEMBERS		NAME (Last, First, Middle Initial)			SSN			
SECTION IV (Continued)		SERVICE MEMBER			SPOUSE			REFERRED TO
		YES	NO	N/A	YES	NO	N/A	
11. EMPLOYMENT ASSISTANCE (Continued)								
h. State Employment Agencies/America's Job Bank								
(1) http://www.ejb.org								
i. Career One Stop http://www.careeronestop.org								
12. RELOCATION ASSISTANCE *NOTE: Status of Forces Agreement limitations apply for overseas Service members.								
a. Permissive (TDY/TAD) and Excess leave								
*b. Travel and transportation allowances								
13. EDUCATION/TRAINING								
a. Education benefits (Montgomery GI Bill, Veterans Educational Assistance Program, Vietnam-era, etc.)								
(1) http://www.gibill.va.gov								
b. Workforce Investment Act (WIA)								
c. Additional education or training options								
(1) Small Business Administration http://www.sba.gov								
d. Licensing, Certification and Apprenticeship Information								
(1) Department of Labor http://www.acinet.org								
(2) U.S. Army https://www.cool.army.mil								
(3) U.S. Military Apprenticeship Program https://www.cnet.navy.mil/usmap/								
(4) DANTES http://www.dantes.doded.mil/dantes_web/danteshome.asp								
e. Defense Activity for Non-Traditional Educational Support http://www.dantes.doded.mil/dantes_web/danteshome.asp								
14. HEALTH AND LIFE INSURANCE								
a. Transitional Health Care Benefit - for Eligibility Criteria and additional information go to: http://www.tricare.osd.mil or http://www.tricare.osd.mil/Factsheets/viewfactsheet.cfm								
b. Option to purchase 18-month conversion health insurance. Concurrent pre-existing condition coverage with purchase of conversion health insurance. http://www.tricare.osd.mil/chcbp								
c. Veterans' Group Life Insurance (VGLI) http://www.insurance.va.gov								
d. Veterans Centers http://www.va.gov/rcs								
15. FINANCES								
a. Financial Management (TSP, Retirement, SBP)								
b. Separation pay (Eligible Involuntary Separatees)								
c. Unemployment compensation								
d. Other financial assistance (VA Loans, SBA Loans, and other government grants and loans)								
16. RESERVE AFFILIATION								
17. VETERANS BENEFITS BRIEFING								
18. DISABLED VETERANS BENEFITS								
a. Disabled Transition Assistance Program (DTAP)								
b. VA Disability Benefits http://www.va.gov								
19. POST GOVERNMENT (MILITARY) SERVICE EMPLOYMENT RESTRICTION COUNSELING								
Information on post government (military) employment counseling (restrictions on employment, imposed by statute and regulation) shall be conducted by Services as appropriate. Transition/Command Career Counselors shall refer separating and retiring Service members to an installation legal office (Staff Judge Advocate or Counselor's Office) to ensure they receive a post government (military) employment restrictions briefing or counseling from an ethics official.								
20. INDIVIDUAL TRANSITION PLAN (ITP)								
a. As a separating Service member, after receiving basic pre-separation counseling information and completing this checklist, you and your spouse (if applicable) are entitled to receive assistance in developing an Individual Transition Plan (ITP) based on the areas of interest you have identified on this checklist. The pre-separation counseling checklist addresses a variety of transition services and benefits to which you may be entitled. Each individual is strongly encouraged to take advantage of the opportunity to develop an ITP. The purpose of the ITP is to identify educational, training, and employment objectives and to develop a plan to help you achieve these objectives. It is the Military Department's responsibility to offer Service members the opportunity and assistance to develop an ITP. It is the Service member's responsibility to develop an ITP based on his/her specific objectives and the objectives of his or her spouse, if appropriate.								
b. Based upon information received during Pre-separation Counseling, do you desire assistance in developing your ITP? If yes, the Transition staff/Command Career Counselor is available to assist you.		SERVICE MEMBER			SPOUSE			
		YES	NO	N/A	YES	NO	N/A	

PRESEPARATION COUNSELING CHECKLIST FOR ACTIVE COMPONENT SERVICE MEMBERS	NAME (Last, First, Middle Initial)	SSN
SECTION V - REMARKS (Attach additional pages if necessary) Complete the following ONLY if you placed an X in Item 7a. See page 1, Section II, Item 7a. 21. My counseling was conducted 89 days or less before my separation or retirement because: (X one) <input type="checkbox"/> MISSION REQUIREMENTS <input type="checkbox"/> PERSONAL REASONS <input type="checkbox"/> MEDICAL SEPARATION <input type="checkbox"/> LEGAL SEPARATION <input type="checkbox"/> CHANGE IN CAREER DECISION <input type="checkbox"/> OTHER (Please provide a brief explanation)		

Appendix:

Management Response from the Marine Corps



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3000 MARINE CORPS PENTAGON
WASHINGTON, DC 20380-3000

IN REPLY REFER TO:
7510
RFR-80
24 Aug 09

MEMORANDUM FOR THE ASSISTANT AUDITOR GENERAL, MANPOWER AND
RESERVE AFFAIRS AUDITS

Subj: NAVAL AUDIT SERVICE (NAS) DRAFT REPORT, "MARINE CORPS
TRANSITION ASSISTANCE MANAGEMENT PROGRAM - PRESEPARATION
COUNSELING REQUIREMENT," (N2008-NFO000-0024)
DATED 29 JULY 2009

Ref: (a) NAS memo of 29 July 2009

Encl: (1) Marine Corps official comments

1. In accordance with reference (a), the Marine Corps has
reviewed the subject draft report and provides comments at the
enclosure.

2. For questions regarding this response, you may contact Mr.
[REDACTED] Headquarters U. S. Marine Corps Audit Liaison
Officer, at [REDACTED] or email
HQMCAuditLiaisons@usmc.mil.

[REDACTED]
[REDACTED]
By direction of the
Commandant of the Marine Corps

FOIA (b)(6)

FOIA (b)(6)

Marine Corps Transition Assistance Management Program — Preseparation Counseling
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Recommendation 1. Establish standard operating procedures that require the UTCs to verify that Checklists are accurately and completely filled out.

USMC Response: Concur. Per Marine Corps Order (MCO) P1700.24B, the UTC must ensure that the DD Form 2648/ 2648-1 is properly completed. UTC training is conducted by TAMP staff within 30 days of appointment. This training provides information on the roles and responsibilities of the UTC. Standard operating procedures for UTCs, to include proper completion of the DD Form 2648/2648-1, shall be created and included as an attachment to the revised MCO. Estimated MCO revision date is set for January 2010.

Recommendation 2. Establish a tracking system and database to collect the stated reasons (as shown on Checklist Item 21) for separating Marines not meeting the 90-day requirement.

USMC Response: Concur. The development of a Case Management System (CMS) to track all USMC TAMP activity, to include reasons shown in Checklist item 21, is currently an action item for FY2010. We are scheduled to begin drafting business requirements for the CMS in May of 2010. CMS roll-out, however, may not occur in the same FY. The CMS will be used by all USMC TAMP personnel, including the UTC. Estimated CMS roll out date is set for May 2011. An interim status report will be provided in May 2010.

Recommendation 3. Determine from UTCs, TAMP Managers, separating Marines, and others if there are reasons beyond those identified in the Checklist responses for not meeting the 90-day requirement.

USMC Response: Concur. A TAMP-FMEAP Survey was conducted between November 2008 and June 2009 to determine program satisfaction and identify any unmet needs for transitioning Service members and families of military members seeking employment and related services. Transitioning Service members included those who were retiring and those who were separating after their service commitment. A total of 1,268 Service members completed the survey. Separating Marines indicated that the top two reasons for not attending the required components of TAMP timely included:

- Mission requirements
 - Deployment Cycles
 - Fleet Assistance Programs
 - Command did not allow
 - Work Requirements
 - Other
- Not aware that he/she could attend earlier

An additional reason reported but not currently listed on the DD Form 2648 is “workshop was full.” We have not collected data from UTCs, TAMP Managers or Commanders to determine other reasons. However, the above survey findings are consistent with surveys

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conducted locally and with feedback received during the recent TAMP-FMEAP Functionality Assessment from TAMP managers.

Recommendation 4. Using the data obtained from Recommendations 2 and 3, develop corrective actions that will ensure Marines required to receive preseparation counseling at least 90 days before their separation do so.

USMC Response: Concur. Future plans for the TAMP include program awareness through marketing as well as the ability to complete the mandated elements of TAMP on-line. Offering completion of mandated elements on-line may reduce the number of those attending outside the standard (NLT 90 days prior to separation). A marketing campaign via the web, posters, marquees, etc. will be appropriate after the revised MCO has been published and the on-line tool has been developed. It is estimated that the revision of the MCO will be completed by January 2010 and that the on-line project be completed by April 2010. It is further estimated that a marketing campaign begin in June 2010.

Recommendation 5. Direct Commanding Officers and Officers-in-Charge to implement the corrective action(s) developed in response to Recommendation 4.

USMC Response: Concur. Future enhancements to the TAMP will be communicated to the appropriate levels of leadership within the Marine Corps. The related mission will be outlined for all subordinate elements via a revised Marine Corps Order. The installation commanders will be required to incorporate, as a mission requirement, the mandated transition timeliness into unit separation procedures and local policy documents. The completion of this recommendation is driven by the revision of the MCO which is set for January 2010.

Recommendation 6. Establish a process to ensure the DD Forms 2648, Preseparation Counseling Checklists, are sent to and received by MMSB-20 for inclusion in the OMPFs.

USMC Response: Concur. Per MCO 1700.24B, the UTC is to ensure that the DD Form 2648/2648-1 is mailed to MMSB-20. A cross-check does not exist to ensure that the UTC has mailed the forms. MMSB-20 is to ensure that the form is scanned into the Marine's official OMPF. A cross-check does not exist to ensure that the same number of forms mailed by the UTC is received by MMSB-20. A cross check does not exists to ensure that the same amount of forms received by MMSB-20 are then scanned. The CMS referenced in response to recommendation #2 will feature the capability to electronically transfer the DD Form 2648/2648-1 into the OMPF. Failure to send the DD Form 2648/2648-1 to MMSB will become evident by reviewing the number of service members completing the requirements against the number of forms electronically transmitted to MMSB. Any failed attempts to transfer the DD Form 2648/2648-1 to the OMPF will be included in rejection reports automatically generated after each feed. Rejection reports will be used to correct failed transmissions. Estimated completion date

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is driven by the CMS roll out in May 2011. An interim status report will be provided in May 2010.

Recommendation 7. Establish supervisory and oversight procedures that ensure Recommendations 1 through 6 are implemented as intended on a continual basis. Oversight procedures should be such that they ensure the Commandant of the Marine Corps is formally notified whenever the Marine Corps does not comply with the 90-day preseparation counseling requirement of Public Law 101-510.

USMC Response: Concur. When the capability to provide unit specific participation data is available, reports will be generated for review and corrective action by Commanders. Further, deficiencies will continue to be identified through the USMC Inspector General inspection process and reported accordingly. This effort and the estimated date is driven by the CMS roll out in May 2011. An interim status report will be provided in May 2010. USMC Inspector General inspections occur on a schedule owned by that office. MRRM does not control the schedule.

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